

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

BLAKE HIGGINS,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 11-CV-090-JHP-TLW
)	
STATE AUTO PROPERTY &)	
CASUALTY INSURANCE)	
COMPANY,)	
)	
Defendant.)	

**DEFENDANT STATE AUTO
PROPERTY & CASUALTY INSURANCE COMPANY’S
AMENDED INFORMATION REGARDING THE DEPOSITION OF GARY MORRIS**

Defendant State Auto Property & Casualty Insurance Company (“STATE AUTO”) submits its Amended Information Regarding the Deposition of Gary Morris, pursuant to this Court’s instructions at the pretrial conference conducted on June 28, 2012. STATE AUTO believes that it fulfilled its duty to meet and confer, in a good faith effort to resolve disputes pursuant to LCvR 30.1, but was unable to reach an agreement.

Initially, STATE AUTO requests that this Court exclude the whole of Gary Morris’ testimony as much of the testimony designated by Plaintiff (and, thus, necessarily counter-designated by STATE AUTO) violates the Court’s rulings on STATE AUTO’s Motions in Limine. Further, the testimony is cumulative of the anticipated live witness testimony at the jury trial and Plaintiff’s other deposition designations. Subject to these general objections, STATE AUTO submits the following:

Defendant STATE AUTO's Amended Designations:¹

4:14, 15
6:10-14
7:3-18, 21-23
8:2, 8-11, 14-24
9:1-3, 6, 7
10:19-24
11:1-5, 8-13
17:10, 11, 13-17, 19, 20
20:7-10
21:2-4, 6-9, 11-24
22:1-3, 10-19
23:2, 3, 20-24
24:1-12
28:18-22
29:18-20, 22-24
30:1, 2
33:10-12, 14
35:14-16, 18
40:24
41:1-3, 5, 6, 8-11, 13-24
42:1-8, 10, 12, 13, 21-24
43:1-4, 6-9, 12-15, 19-21
44:4-7, 16-24
45:1-10, 24
46:1, 2 5-9
47:12-17, 19
48:8, 9, 11, 13-24
49:1-3, 5-8, 16-19
51
53:13-15, 18-21
54:10, 11, 13
59:14-24
60:1-9, 12-24
61:1, 2, 5, 7-12, 20-22
62:1-4, 7-11
69:14-23
70: 1, 2, 4-8, 10-14, 16-23

¹Amendment to STATE AUTO's Designations were made solely based upon this Court's ruling, including the Motions for Summary Judgment and Motions in Limine. Should this Court later revise its rulings, STATE AUTO reserves the right to re-urge its original designations.

83:16-19
86:19, 21-24
87:2, 3
90:1, 3-23
91:9-24
92:1-15, 17-24
93:4-19
94:22-24
95:1-12, 15-24
96:1-14
98:4-17
100:1-6

Defendant STATE AUTO's Amended Counter Designations:²

13:5-7
26:2-4, 15-23
36:6-8
41:5-6, 8-11, 13-24
42:1-5
44:9, 16-24
45:1-10
48:8-9, 11, 13-24
49:1-3, 5-8, 16-19
53:13-15
61:1-2, 5-12
77:15-19
83:16-19
89:23-24
110
113
118:1, 3, 4

²STATE AUTO objects to admission of the related testimony designated by Plaintiff that is excluded or subject to STATE AUTO's Motions in Limine, granted, and/or that may be reurged at trial.

Defendant STATE AUTO's Amended Objections:

Testimony Designated or Counter-Designated by Plaintiff	<u>Objections</u>
6:18-19	Relevance
6:20-22	Speculative; Personal knowledge to testify; Prejudicial; Foundation
6:23-24 7:1-2	Speculative; Lack of knowledge; Relevance; Prejudicial; Foundation
8:12-13	STATE AUTO requests that the Court strike the extraneous dialogue
9:1-3, 6-7	Handling of any other claims
9:8-10	Relevance; Cumulative evidence
9:11-22	Relevance; Lack of knowledge/recall; Foundation; Prejudicial; Cumulative evidence; Assumes facts not in evidence
9:23-24	Motion in Limine regarding reserves
10:1-7	Motion in Limine regarding reserves
10:6-7	Relevance; Lack of knowledge/recall; Prejudicial; Cumulative evidence
11:14-15, 17-19	Argumentative; Foundation; Relevance; Assumes facts not in evidence; Vague; Ambiguous
11:20-24 12:1-9	Relevance; Cumulative evidence; Prejudicial
12:21-22	Golden Rule; Testimony regarding employees "proud" of how Plaintiff was treated
13:1-2	Golden Rule; Testimony regarding employees "proud" of how Plaintiff was treated
14:12-16	Relevance; Speculative; Vague/Ambiguous; Foundation; Lack of knowledge
14:17-19	Relevance; Foundation; Vague/Ambiguous
14:20-23	Relevance; Vague/Ambiguous; Motion in Limine regarding reference that any 1 person owed duty of good faith to Plaintiff

14:24, 15:1-2, 4-5	Argumentative; Foundation; Assumes facts not in evidence; Vague/Ambiguous; Compound
15:10-12, 14- 15	Vague/Ambiguous; Foundation; Assumes facts not in evidence; Argumentative; Calls for speculation; Lack of knowledge; Relevance
15:16-20	Vague/Ambiguous; Foundation; Lack of knowledge/recall
15:21-23 16:1	Relevance; Foundation; Calls for speculation
16:2-4	Foundation; Relevance; Prejudicial
16:8-24	Speculative; Vague/Ambiguous; Relevance; Prejudicial; Evidence regarding handling of any other claim other than Plaintiff
17:1-6	Relevance; Ambiguous; Prejudicial
17:7-9	Prejudicial; Relevance; Vague/Ambiguous
17:23-24 18:1-13	Relevance; Prejudicial; Foundation; Speculative; Vague/Ambiguous; Confusing; Motion in Limine regarding no mention of a duty to tender partial payment
18:20-24 19:1	Relevance; Cumulative evidence
19:2-6	Relevance; Lack of knowledge/recall; Vague/Ambiguous
19:11-20	Relevance; Prejudicial; Improper instruction
20:3-6	Relevance; Cumulative evidence
20:11-12	Relevance; Vague/Ambiguous; Prejudicial
20:13-14, 16- 17	Argumentative; Assumes facts not in evidence; Calls for opinion without personal knowledge; Calls for speculation; Lack of knowledge; Relevance; Prejudicial
20:18-24 21:1	Foundation; Assumes facts not in evidence; Speculative; Relevance; Prejudicial
22:4-5, 8-9	Relevance; Cumulative evidence; Vague/Ambiguous; Testimony regarding treating Plaintiff's claim as 3 rd party vs. 1 st party; Motion in Limine regarding statements regarding how other insurers handle UM/UIM claims
22:22-24 23:1	Relevance; Calls for a legal conclusion; Vague/Ambiguous; Lack of knowledge/recall; Prejudicial

23:4-15	Relevance; Cumulative evidence; Calls for a legal conclusion; Lack of knowledge/recall; Prejudicial
23:16-19	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance
24:13-15	Relevance; Foundation; Lack of knowledge/recall; Vague/Ambiguous
24:16-23	Relevance; Foundation
24:24 25:1-2	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance
25:3-8	Relevance; Lack of knowledge/recall; Ambiguous; Relevance
25:9-10	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance
25:21-24 26:1	We counter-designated such that taking this out would make it read weird—how do you want to handle that??
26:24 27:1-2, 4-6	Argumentative; Foundation; Relevance; Lack of recall
27:7-18	Foundation; Assumes facts not in evidence; Relevance; Vague/Ambiguous
27:19-20; 22-24 28:1-5	Mischaracterizes prior testimony; Argumentative; Foundation; Relevance; Prejudicial
28:6-13	Relevance; Foundation; Prejudicial; Assumes facts not in evidence; Vague/Ambiguous
28:14-15, 17	Relevance; Mischaracterizes prior testimony; Argumentative; Prejudicial
28:23-24 29:1-6	Relevance; Vague/Ambiguous; Narrative
29:7-16	Relevance; Vague/Ambiguous
30:3-5	Calls for speculation; Personal knowledge to testify; Relevance; Foundation
30:8-9, 11-13	Foundation; Relevance; Vague/Ambiguous; Prejudicial; Violates Order on Motion in Limine regarding employee pay
30:14-16, 18-20	Relevance; Prejudicial; Vague/Ambiguous; Violates Order on Motion in Limine regarding employee pay
30:21-22, 24	Relevance; Lack of knowledge/recall; Prejudicial; Violates Order on Motion in Limine regarding employee pay

31:1-2, 4	Asked and answered; Relevance; Vague/Ambiguous; Prejudicial; Violates Order on Motion in Limine regarding employee pay
31:5-13	Relevance; Prejudicial; Vague/Ambiguous; Lack of knowledge; Cumulative evidence; Violates Order on Motion in Limine regarding employee pay
31:14-15, 17-18	Foundation; Relevance; Asked and answered; Prejudicial; Lack of recall; Violates Order on Motion in Limine regarding employee pay
32:4-12	Foundation; Relevance; Speculative
32:13-24 33:1-2	Relevance; Speculative; Cumulative evidence; Narrative
33:15-17	Relevance; Prejudicial; Speculative; Foundation
34:8-13	Speculative; Foundation; Relevance; Personal knowledge to testify
34:14-24 35:1-12	Relevance; Cumulative evidence; Vague/Ambiguous; Contains extraneous dialogue
35:19-22, 24 36:1-3	Argumentative; Assumes facts not in evidence; Foundation; Relevance; Vague/Ambiguous
36:17-24 37:1-8	No question posed; Narrative; Relevance; Evidence about any clerical/typographical errors in claim file
37:9-21	Relevance; Foundation; Speculative; Prejudicial; Cumulative evidence
37:22-24 38:2-3	Argumentative; Foundation; Relevance
38:4-5, 7-15	Foundation; Relevance; Vague/Ambiguous
38:18-24	Relevance; Speculative; Prejudicial; Vague/Ambiguous; Cumulative evidence
39:1-2	Relevance; Cumulative evidence; Prejudicial
39:3-5	Relevance; Cumulative evidence
40:13-14, 16-18	Relevance; Speculative; Personal knowledge to testify
40:19-23	Relevance; Speculative; Prejudicial
42:14-16, 18-20	Calls for legal conclusion; Argumentative; Foundation; Vague/Ambiguous
43:6-9, 11	Calls for speculation; Argumentative; Foundation; Relevance; Vague/Ambiguous; Prejudicial

43:19-24	Relevance; Cumulative evidence; Foundation; Prejudicial
45:17-23	Relevance
45:11-14	Objection to procedure (easel)
46:13-24 47:1, 3-7	Relevance; Cumulative evidence; Prejudicial
47:9-11	STATE AUTO requests that the Court strike the extraneous dialogue
47:18	STATE AUTO requests that the Court strike the objection
48:10, 12	STATE AUTO requests that the Court strike the objections
49:9-14	Foundation; Relevance; Asked and answered; Vague/Ambiguous; Cumulative evidence
49:20, 22-23	Relevance; Ambiguous; Calls for speculation; Calls for narrative; Cumulative evidence
49:24 50:1, 3-4	Calls for speculation; Opinion without personal knowledge; Lack of knowledge; Relevance; Asked and answered; Cumulative evidence
50:5-14	Relevance; Vague/Ambiguous; Cumulative evidence
51:7	STATE AUTO requests that the Court strike the extraneous dialogue
51:23-24 52:1-4	Relevance; Vague/Ambiguous; Prejudicial; Violates Order on Motion in Limine regarding reserves
52:11-16	Relevance; Prejudicial; Violates Order on Motion in Limine regarding reserves
52:17-19, 21-22	Foundation; Relevance; Argumentative; Prejudicial; Mischaracterizes prior testimony; Violates Order on Motion in Limine regarding reserves
53:6-7, 9-12	Relevance; Asked and answered; Vague/Ambiguous; Prejudicial; Violates Order on Motion in Limine regarding reserves
53:24 54:1-9	Relevance; Cumulative evidence; Foundation
54:15-24	Relevance; Prejudicial; Vague/Ambiguous; Foundation; Violates Order on Motion in Limine regarding reserves
55:1-7	Relevance; Prejudicial; Speculative; Vague/Ambiguous; Violates Order on Motion in Limine regarding reserves
55:8-17	Relevance; Prejudicial; Contains extraneous dialogue

56:19-22	Relevance; Vague/Ambiguous; Foundation; Prejudicial; Assumes facts not in evidence; Violates Order on Motion in Limine regarding reserves
56:23 57:1-11	Relevance; Ambiguous/Vague; Harassment; Contains extraneous dialogue; Prejudicial; Answer is non-responsive to question; Violates Order on Motion in Limine regarding reserves
57:12-18	STATE AUTO requests that the Court strike the extraneous dialogue
58:7-9, 11	Foundation; Relevance; Vague/Ambiguous; Lack of recall/knowledge; Prejudicial; Personal knowledge to testify
58:12-14	Relevance; Prejudicial; Cumulative evidence; Foundation
58:15-16	Relevance; Prejudicial; Cumulative evidence; Speculative
58:17-18, 20	Argumentative; Foundation; Relevance; Ambiguous/Vague; Speculative; Prejudicial
58:23-24 59:1, 3	Argumentative; Cumulative evidence; Prejudicial; Foundation; Relevance; Personal knowledge to testify; Hearsay
59:8-9, 11-13	Argumentative; Relevance; Assumes facts not in evidence; Ambiguous/Vague
60:8-9, 12-15	Argumentative; Relevance; Assumes facts not in evidence
62:5-6	STATE AUTO requests that the Court strike the objection
62:12-14	Personal knowledge to testify; Relevance; Vague/Ambiguous; Speculative; Prejudicial; Foundation; Hearsay
62:15-20	Relevance; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves
62:21-24	Assumes facts not in evidence; Foundation; Relevance; Prejudicial; Mischaracterizes testimony; Document violates Order on Motion in Limine regarding reserves; Failure to reveal policy limits
63:1-24 64:1-10	Relevance; Cumulative evidence; Foundation; Personal knowledge to testify; Document violates Order on Motion in Limine regarding reserves
64:16	Relevance
65:2-12	Relevance; Cumulative evidence; Prejudicial; Personal knowledge; Violates Order on Motion on Limine regarding reserves
65:13-14, 16	Calls for speculation; Opinion without personal knowledge; Relevance; Prejudicial; Document violates Order on Motion in Limine regarding reserves

65:23-24 66:1	Personal knowledge to testify; Foundation; Relevance; Speculative; Document violates Order on Motion in Limine regarding reserves
66:2-4, 6-7	Mischaracterizes prior testimony; Calls for speculation; Relevance; Argumentative; Vague/Ambiguous; Document violates Order on Motion in Limine regarding reserves
66:8-15	Relevance; Prejudicial; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves
66:18-25 67:1	Relevance; Prejudicial; Cumulative evidence; Mischaracterizes prior testimony; Speculative; Argumentative
67:2-4	Relevance; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves
67:5-6, 8-10	Relevance; Vague/Ambiguous; Speculative; Personal knowledge to testify; Prejudicial; Violates Order on Motion in Limine regarding reserves
67:11-14	Relevance; Prejudicial; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves
67:15-19, 21-24 68:1-4	Argumentative; Personal knowledge to testify; Speculative; Vague/Ambiguous; Prejudicial; Foundation; Relevance; Contains extraneous dialogue; Violates Order on Motion in Limine regarding reserves
68:5-11	Ambiguous; Speculative; Foundation; Prejudicial; Personal knowledge to testify; Violates Order on Motion in Limine regarding reserves; Motion in Limine regarding damages for future medical/lost wages
70:4-8, 10-12	Relevance; Calls for legal conclusion
71:12-23	Relevance; Prejudicial; Speculative; Foundation; Cumulative evidence; Contains extraneous dialogue; Violates Order on Motion in Limine regarding reserves
71:24 72:1-2	Relevance; Cumulative evidence; Prejudicial; Vague/Ambiguous; Violates Order on Motion in Limine regarding reserves
72:24 73:1-11	Relevance; Cumulative evidence; Violates Order on Motion in Limine regarding reserves
73:12-13, 15-16	Calls for speculation; Relevance; Opinion without personal knowledge; Vague/Ambiguous; Document violates Order on Motion in Limine regarding reserves
73:17-22	Relevance; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves

73:23-24 74:1-4	Relevance; Speculative; Vague/Ambiguous; Violates Order on Motion in Limine regarding reserves
74:5-10	Relevance; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves
74:16-18	Relevance; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves
74:19-21	Relevance; Vague/Ambiguous; Speculative; Document violates Order on Motion in Limine regarding reserves
74:22-25 75:1	Relevance; Prejudicial; Foundation; Lack of knowledge/recall; Document violates Order on Motion in Limine regarding reserves
75:6-8, 10-24	Relevance; Prejudicial; Personal knowledge; Foundation; Document violates Order on Motion in Limine regarding reserves
76:1-5, 9-24	Relevance; Prejudicial; Personal knowledge; Foundation; Document violates Order on Motion in Limine regarding reserves; Evidence about clerical/typographical errors in claim file
76:4-6	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance; Vague/Ambiguous
77:1-2, 5-10, 12-14	Relevance; Prejudicial; Personal knowledge; Foundation; Document violates Order on Motion in Limine regarding reserves: Evidence about clerical/typographical errors in claim file
77:1, 5-10, 12-14	Relevance; Document violates Order on Motion in Limine regarding reserves; Prejudicial; Evidence about clerical/typographical errors in claim file
77:20-23 78:1	Objection to process; No question posed; Relevance; Prejudicial; Document violates Order on Motion in Limine regarding reserves
78:9-15	Relevance; Cumulative evidence; Contains extraneous dialogue; Document violates Order on Motion in Limine regarding reserves
78:21-24 79:1-2	Relevance; Foundation; Vague/Ambiguous; Narrative; Violates Order on Motion in Limine regarding reserves
79:7-10	Relevance; Cumulative evidence
79:11-12, 14- 15	Relevance; Lack of knowledge
79:16-17, 19	Argumentative; Assumes facts not in evidence; Relevance; Lack of knowledge; Foundation
80:2-3, 5-6	Asked and answered; Relevance; Cumulative evidence

80:7-14	Relevance; Personal knowledge to testify; Cumulative evidence
80:15-16, 19	Asked and answered; Relevance; Vague/Ambiguous; Cumulative evidence
80:20-23, 24	Objection to process; Relevance; Prejudicial
81:4-6	Relevance; Cumulative evidence
81:7-10	Cumulative evidence; Relevance; Document violates Order on Motion in Limine regarding reserves
81:13-16	Relevance; Cumulative evidence
81:19-24	Vague/Ambiguous; Relevance; Speculative; Cumulative evidence
82:1-11	Cumulative evidence; Speculative; Relevance; Document violates Order on Motion in Limine regarding reserves
82:12, 14-16, 23-24 83:1-2	Objection to process; Argumentative; Prejudicial; Speculative; Relevance
83:4-11	Personal knowledge to testify; Relevance; Speculative; Vague/Ambiguous; Prejudicial; Foundation; Document violates Order on Motion in Limine regarding reserves
84:1-9, 11-18, 21-23 85:1-4	Relevance; Foundation; Assumes facts not in evidence; Prejudicial; Lack of knowledge
86:19, 21-22	Argumentative; Foundation; Calls for legal conclusion; Relevance; Cumulative evidence
86:23-24 87:2-3	Relevance; Foundation; Cumulative evidence
87:4-7	Relevance; Cumulative evidence; Document violates Order on Motion in Limine regarding reserves
87:8, 10	Argumentative; Relevance; Vague/Ambiguous; Hearsay; Document violates Order on Motion in Limine regarding reserves
87:11-15	Relevance; Cumulative evidence; Hearsay; Document violates Order on Motion in Limine regarding reserves
87:17-21	Relevance; Cumulative evidence; Vague/Ambiguous; Document violates Order on Motion in Limine regarding reserves; Failure to reveal policy limits
87:22-24 88:1	Relevance; Foundation; Prejudicial; Lack of knowledge/recall; Failure to reveal policy limits

88:2-3	Personal knowledge to testify; Relevance; Prejudicial
89:6-11	Relevance; Prejudicial; Personal knowledge to testify; Foundation; Assumes facts not in evidence; Evidence about George Gartelos working from home
90:3-23	Violates Order on Motion in Limine regarding reserves
91:5-8	Cummulative
94:2-16	Relevance; Cumulative evidence
94:17-21	Relevance; Cumulative evidence; Vague/Ambiguous
96:15-17, 19	Calls for demonstration; No question posed; Relevance; Prejudicial
96:20-24 97:1-8	Relevance; Prejudicial; Speculative; Vague/Ambiguous; Cumulative evidence
97:10-13, 17	Calls for demonstration; Relevance; Foundation; Lack of knowledge; Prejudicial; Cumulative evidence; Speculative; Vague/Ambiguous
98:22-23 99:2-5, 8-18, 21-24	Lack of personal knowledge; Relevance
100:7-12	Foundation; Cumulative evidence; Relevance; Vague/Ambiguous
100:21-23	Relevance; Prejudicial; Lack of knowledge/recall
100:24 101:1-19	Relevance; Prejudicial; Speculative; Foundation; Violates Order on Motion in Limine regarding employee pay; Evidence about employees compensation
103:18-24 104:1-2	Relevance; Prejudicial
104:3-9	Relevance; Cumulative evidence; Personal knowledge to testify; Lack of recall
104:10-12, 14	Calls for speculation; Opinion without personal knowledge; Assumes facts not in evidence; Lack of knowledge; Relevance; Foundation
104:15-18	Relevance; Foundation; Vague/Ambiguous; Lack of knowledge
104:19-21, 23-24 105:1	Calls for speculation; Opinion without personal knowledge; Lack of knowledge; Relevance; Vague/Ambiguous
105:9-24 106:1-3	Asked and answered; Argumentative; Calls for speculation; Opinion without personal knowledge; Lack of knowledge; Relevance; Foundation; Cumulative evidence

106:4-5, 7-13	Relevance; Foundation; Vague/Ambiguous
106:21-24 107:3-4	Argumentative; Asked and answered; Relevance; Cumulative evidence
107:5-7, 9-10	Asked and answered; Cumulative evidence; Relevance
107:22-24 108:2	Calls for speculation; Opinion without personal knowledge; Lack of knowledge; Relevance; Vague/Ambiguous
108:2-8	Relevance; Lack of knowledge/recall; Foundation; Vague/Ambiguous
108:9-12	Relevance; Speculative; Prejudicial; Harassment
109:2-3	Evidence regarding employees compensation
109:13-15, 23-24 110:1	Relevance; Foundation; No punitive damages claim; Personal knowledge
111:19-20	STATE AUTO requests that the Court strike the extraneous dialogue; Relevance
111:18, 22	No question posed; Relevance; No punitive damages claim; Personal knowledge
112:1-5, 7	Argumentative; Relevance; Foundation; Prejudicial; No punitive damages claim; Personal knowledge
112:8-9, 11-14	Calls for speculation; Prejudicial; Vague/Ambiguous; Relevance; Foundation; Lack of knowledge; No punitive damages claim; Personal knowledge
112:15-18	Relevance; Cumulative evidence; Foundation; No punitive damages claim; Personal knowledge
115:12	Relevance; Cumulative evidence
116:19, 21-22	Relevance
116:23 117:1-4	Relevance
117:5-6, 8-12	Relevance; Vague/Ambiguous
117:13, 15-16	Relevance
117:17-24	Relevance; Cumulative evidence
118:5-6, 8	No question posed; Relevance; Cumulative evidence; Asked and answered

118:9-10, 12-15	Argumentative; Vague/Ambiguous; Foundation; Relevance
118:16-24	Relevance; Cumulative evidence; Foundation; Personal knowledge
119:1, 3-4	Asked and answered; Relevance; Cumulative evidence; Foundation; Personal knowledge
119:6-7, 9-10	Relevance; Vague/Ambiguous; Asked and answered; Cumulative evidence; Foundation; Personal knowledge
119:11-12, 14	Relevance; Cumulative evidence; Asked and answered; Foundation; Personal knowledge
119:19-22, 24	Relevance; Asked and answered; Foundation; Personal knowledge
120:1-2, 4	Relevance; Asked and answered; Foundation; Personal knowledge
120:5-11	STATE AUTO requests that the Court strike the extraneous dialogue
120:12-13	Relevance; Prejudicial; Vague/Ambiguous
120:14-24 121:1-14	Relevance; Improper testimony

Respectfully submitted,

ROBINETT & MURPHY

By: /s/ Pansy Moore-Shrier

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Certificate of Service

I hereby certify that on August 1, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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/s/ Pansy Moore-Shrier

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